

ESTTA Tracking number: **ESTTA774225**

Filing date: **10/03/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding.	91228293
Applicant	Defendant Kamran RanjbarNikkhah
Other Party	Plaintiff GoPro, Inc.
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	Yes

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 10/14/2016. Kamran RanjbarNikkhah requests that such date be extended for 90 days, or until 01/12/2017, and that all subsequent dates be reset accordingly.

Time to Answer :	01/12/2017
Deadline for Discovery Conference :	02/11/2017
Discovery Opens :	02/11/2017
Initial Disclosures Due :	03/13/2017
Expert Disclosure Due :	07/11/2017
Discovery Closes :	08/10/2017
Plaintiff's Pretrial Disclosures :	09/24/2017
Plaintiff's 30-day Trial Period Ends :	11/08/2017
Defendant/Counterclaim Plaintiff's Pretrial Disclosures :	11/23/2017
30-day Trial Period for Defendant and Plaintiff in the Counterclaim :	01/07/2018
Counterclaim Defendant's and Plaintiff Rebuttal Disclosures Due :	01/22/2018
30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff ends :	03/08/2018
Counterclaim Plaintiff's Rebuttal Disclosures Due :	03/23/2018
15-day Rebuttal Period for Counterclaim Plaintiff Ends :	04/22/2018
Plaintiff's Trial Brief Due :	06/21/2018
Defendant's Trial Brief and Plaintiff in the Counterclaim Due :	07/21/2018
Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due :	08/20/2018
Reply Brief, if any, for Plaintiff in the Counterclaim	09/04/2018

Due :

The grounds for this request are as follows:

- *because of some official-business works I need to leave United State, so I will be abroad during that time. I need the time of my defense to be extended for 90 days, so I'll be able to defend my case in court (in person), I'll appreciate your co-operation on this matter. best regards- Kamran Ranjbar Nikkhah*

Kamran RanjbarNikkhah has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Kamran RanjbarNikkhah has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,
/Kamran RanjbarNikkhah/
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10/03/2016